

Federal Identification Number

31-4333125

Vorys, Sater, Seymour and Pease LLP

500 Grant Street, Suite 4900

Pittsburgh, PA 15219-2502

Telephone (412) 904-7700

OCTOBER 31, 2019
INVOICE NO. 1334461
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements

Period Ending: September 30, 2019

RE: VITA EEP LITIGATION

DATE	DESCRIPTION	ATTY	HOURS
09/10/19	Telephone conference with Attorney Admissions officer regarding applying for permanent admittance into Western District of Wisconsin.	KGB	0.20
09/17/19	Email correspondence with Veritext regarding service on defendants.	KGB	0.30
09/23/19	Email correspondence with process server regarding status of service on defendants.	KGB	0.20
09/30/19	Email correspondence with Veritext regarding service on Mr. Galeev. Calculate answer deadlines for defendants.	KGB	0.30

TOTAL FOR SERVICES

EXHIBIT
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\$350.00

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OCTOBER 31, 2019

BILLING SUMMARY

	RATE	HOURS	TOTALS
KATHERINE G. BARNES	350.00	1.00	350.00

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NOVEMBER 26, 2019
INVOICE NO. 1338292
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements

Period Ending: October 31, 2019

RE: VITA EEP LITIGATION


DATE	DESCRIPTION	ATTY	HOURS
10/04/19	Research Florida law on how to effect service on corporations.	KGB	1.30
10/07/19	Final revisions to notice of service and attend to filing the same.	KGB	0.40
10/14/19	Review email from Ms. Maher regarding communications received from defendants regarding complaint. Review communications from defendant regarding complaint. Develop strategy regarding motion for default.	WDK	0.60
10/14/19	Prepare strategy for seeking default judgment. Preparation of motion papers related to same.	TBP	0.30
10/14/19	Review docket to confirm that Vita EEP LLC has not filed answer. Review letter from Mr. Galeev and prepare email transmitting the same to Mr. Klinker and Ms. Howden.	KGB	1.80

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 NOVEMBER 26, 2019

	Begin drafting motion for default. Prepare litigation hold letter.		
10/15/19	Preparation of litigation hold letter. Correspondence with Mr. Klinker regarding same.	TBP	0.10
10/16/19	Begin preparing Request for Entry of Default and Motion for Default Judgment.	KGB	1.70
10/22/19	Develop strategy regarding contact from Ms. Galeev and/or her counsel and potential default judgment. Email to Ms. Howden and Mr. Klinker regarding potential default judgment.	WDK	0.80
10/22/19	Review of correspondence from Mr. Galeev regarding lawsuit. Develop strategy for seeking default judgment.	TBP	0.20
10/22/19	Analyze strategy regarding [REDACTED]	KGB	0.20
10/28/19	Finalize Request for Entry of Default and Draft Declaration in Support thereof.	KGB	1.50
10/29/19	Review motion for default and related affidavits.	WDK	0.50
10/29/19	File Request for Entry of Default. Draft letter to Mr. Galeev enclosing the same.	KGB	0.60

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NOVEMBER 26, 2019

TOTAL FOR SERVICES	\$4,086.00
LESS PROFESSIONAL ADJUSTMENT	\$ (25.02)
AMOUNT DUE FOR SERVICES	\$4,060.98
DISBURSEMENTS	
OUTSIDE PROFESSIONAL SERVICES	95.00
TOTAL DISBURSEMENTS	\$95.00
TOTAL FOR SERVICES AND DISBURSEMENTS	\$4,155.98
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BILLING SUMMARY

	RATE	HOURS	TOTALS
WILLIAM D. KLOSS JR.	630.00	1.90	1,197.00
TYLER B. PENSYL	440.00	0.60	264.00
KATHERINE G. BARNES	350.00	7.50	2,625.00

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DECEMBER 30, 2019
INVOICE NO. 1343178
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements

Period Ending: November 30, 2019

RE: VITA EEP LITIGATION


DATE	DESCRIPTION	ATTY	HOURS
11/05/19	File Request for Entry of Default. Draft letter to Mr. Galeev enclosing the same.	KGB	0.30
11/11/19	Review of entry of default. Review of motion for default judgment filed in prior case against AVC Infinite and develop strategy for moving forward with default judgment or seeking settlement.	TBP	0.40
11/13/19	Draft letter to Mr. Galeev enclosing Entry of Default.	KGB	0.70
11/20/19	Exchange emails with Ms. Barnes regarding notice of default.	WDK	0.10

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DECEMBER 30, 2019

TOTAL FOR SERVICES \$589.00

DISBURSEMENTS

COURIER SERVICE 39.48

TOTAL DISBURSEMENTS \$39.48

TOTAL FOR SERVICES AND DISBURSEMENTS \$628.48

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BILLING SUMMARY

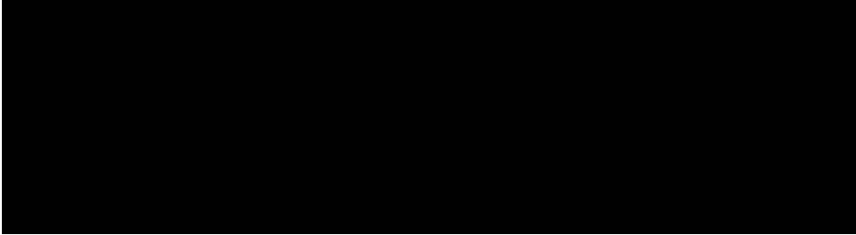
	RATE	HOURS	TOTALS
WILLIAM D. KLOSS JR.	630.00	0.10	63.00
TYLER B. PENSYL	440.00	0.40	176.00
KATHERINE G. BARNES	350.00	1.00	350.00

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JANUARY 28, 2020
INVOICE NO. 1347111
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements

Period Ending: December 31, 2019

RE: VITA EEP LITIGATION


DATE	DESCRIPTION	ATTY	HOURS
12/03/19	Review and revise settlement agreement.	WDK	1.50
12/04/19	Additional preparation of settlement agreement.	WDK	0.50
12/05/19	Additional preparation of release. Preparation of correspondence to Irek Galeev regarding release.	WDK	0.70
12/05/19	Review and preparation of settlement agreement.	TBP	0.30
12/06/19	Finalize settlement agreement proposal. Transmit letter to Mr. Galeev regarding same.	WDK	0.50

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INVOICE NO.: 1347111

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JANUARY 28, 2020

TOTAL FOR SERVICES	\$2,148.00
LESS PROFESSIONAL ADJUSTMENT	\$ (295.66)
AMOUNT DUE FOR SERVICES	\$1,852.34
DISBURSEMENTS	
COURIER SERVICE	22.05
TOTAL DISBURSEMENTS	\$22.05
TOTAL FOR SERVICES AND DISBURSEMENTS	\$1,874.39
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BILLING SUMMARY

	RATE	HOURS	TOTALS
WILLIAM D. KLOSS JR.	630.00	3.20	2,016.00
TYLER B. PENSYL	440.00	0.30	132.00

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FEBRUARY 21, 2020
INVOICE NO. 1350534
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements

Period Ending: January 31, 2020

RE: VITA EEP LITIGATION


DATE	DESCRIPTION	ATTY	HOURS
01/16/20	Review of case status. Develop strategy for seeking default judgment.	TBP	0.20
01/20/20	Review file related to default judgment. Office conference Mr. Pensyl regarding default judgment.	WDK	0.20
01/21/20	Analysis regarding default judgment.	WDK	0.30
01/21/20	Attention to motion for default judgment and strategy for same.	TBP	0.20
01/24/20	Review pleadings in preparation for drafting motion for default judgment.	AKM	1.10
01/24/20	Draft motion for default judgment.	AKM	3.40
01/25/20	Revise motion for default judgment and draft declaration in support of the same.	AKM	3.10

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 FEBRUARY 21, 2020

01/27/20	Review default judgment notice. Review Vita EEP Amazon storefront.	WDK	0.40
01/27/20	Revise brief in support of motion for default judgment.	AKM	1.60
01/28/20	Communications with Mr. Kloss and Ms. Hood regarding captures of negative reviews.	BSK	0.30
01/28/20	Examine customer reviews for storefront Vita EEP, LLC and create [REDACTED] [REDACTED] for Mr. Kloss. Office conference with Ms. Klingbeil and Mr. Kloss regarding same.	MLH	1.10

TOTAL FOR SERVICES	\$4,001.50
LESS PROFESSIONAL ADJUSTMENT	\$ (709.83)
AMOUNT DUE FOR SERVICES	\$3,291.67
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BILLING SUMMARY

	RATE	HOURS	TOTALS
WILLIAM D. KLOSS JR.	665.00	0.90	598.50
TYLER B. PENSYL	480.00	0.40	192.00
ARRYN K. MINER	330.00	9.20	3,036.00
BRIDGETT S. KLINGBEIL	235.00	0.30	70.50
MEREDITH L. HOOD	95.00	1.10	104.50

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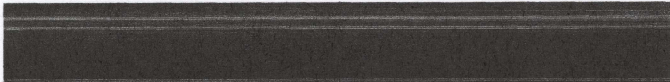
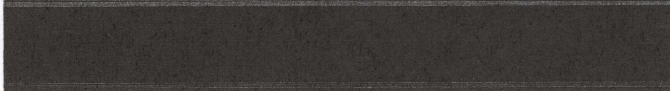
Telephone (412) 904-7700

MARCH 12, 2020
INVOICE NO. 1353646
DAREN S. GARCIA
ACCT NO. 075920-000004

Statement of Services and Disbursements


Period Ending: February 29, 2020

RE: VITA EEP LITIGATION


DATE	DESCRIPTION	ATTY	HOURS
02/06/20		PKH	2.30
02/07/20		PKH	1.00
02/19/20	Review and revise motion for default judgment.	WDK	0.50
02/19/20	Revise brief in support of motion for default judgment.	AKM	1.30
02/20/20	Preparation of motion for default judgment. Exchange emails with Ms. Miner regarding motion.	WDK	0.50
02/24/20	Additional emails with Ms. Maher regarding motion for default. Exchange emails with Ms. Hardin regarding order on Injunction. Revise Order. Review Court's order setting default hearing. Exchange emails with Ms. Hardin regarding default hearing.	WDK	1.10

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MARCH 12, 2020

02/24/20	Review of motion for default judgment and permanent injunction. Review of court order regarding hearing on same.	TBP	0.50
02/25/20	Preparation of notice of appearance. Preparation of correspondence to Mr. Galeev regarding same.	TBP	0.30
02/26/20	Review pleadings associated with motion for default judgment. Review decision granting default judgment.	WDK	0.50
02/28/20		PKH	0.50

TOTAL FOR SERVICES \$3,340.00

LESS PROFESSIONAL ADJUSTMENT \$ (644.81)

AMOUNT DUE FOR SERVICES

\$1,897.19 ~~\$2,695.19~~

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BILLING SUMMARY

	RATE	HOURS	TOTALS
WILLIAM D. KLOSS JR.	665.00	2.60	1,729.00
TYLER B. PENSYL	480.00	0.80	384.00
ARRYN K. MINER	330.00	1.30	429.00
PAMELA K. HUTCHINS	210.00	3.80	798.00